

1 SIDNEY J. COHEN, Esq., State Bar No. 39023
2 SIDNEY J. COHEN PROFESSIONAL CORPORATION
3 427 Grand Avenue
4 Oakland, CA 94610
5 Telephone: (510) 893-6682

6 Attorneys for Plaintiff
7 HOLLYNN DELIL

8 KURT A. FRANKLIN
9 ADAM HOFFMAN
10 HANSON BRIDGET LLP
11 425 Market Street, 26th Floor
12 San Francisco, CA 94105
13 Telephone: (415) 777-3200

14 Attorneys for Defendant
15 GOLDEN GATE BRIDGE, HIGHWAY,
16 AND TRANSPORTATION DISTRICT

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA

19 HOLLYNN DELIL

CASE NO. C 08-1105 MEJ
Civil Rights

20 Plaintiff,

21 v.

22 GOLDEN GATE BRIDGE, HIGHWAY,
23 AND TRANSPORTATION DISTRICT;
24 and DOES 1 through 20, Inclusive,

**STIPULATION AND ORDER
(PROPOSED) TO CONTINUE
PRETRIAL DEADLINES AND
TRIAL DATE**

25 Defendants.

26 _____ /

27 Plaintiff Hollynn Delil and Defendant Golden Gate Bridge, Highway, And
28 Transportation District, by and through their counsel of record stipulate as follows:

29 1. This Stipulation And Order (Proposed) To Continue Pretrial Deadlines And
30 Trial Dates is entered into between the parties with respect to the following presently
31 scheduled pretrial deadlines and trial date:

32 Stipulation And [Proposed] Order For
33 Case Management Conference

- 1 a. September 10, 2010: Expert Witness Disclosure.
- 2 b. September 20, 2010: Rebuttal Expert Witness Disclosure.
- 3 c. October 5, 2010: Completion Of All Discovery
- 4 d. November 4, 2010: Last Day To File, Serve, And Notice
- 5 Dispositive Motions
- 6 e. December 9, 2010: Last Date to Hear Dispositive Motions.
- 7 f. February 9, 2011: Last Day to Meet and Confer for Pretrial
- 8 Statement Preparation and Content, Etc.
- 9 g. February 24, 2011: Last Day to File Joint Pretrial Statement And
- 10 Documents Described In FRCP 26(a)(3), Etc.
- 11 Last Day To File In Limine Motions
- 12 h. March 3, 2011: Last Day To File Opposition To In Limine
- 13 i. March 10, 2011: Pretrial Conference
- 14 j. March 11, 2011: Last Day To File Trial Briefs, Joint Set Of
- 15 Required Voir Dire, Voir Dire Questions Not
- 16 Agreed Upon, Joint Set Of Additional Proposed
- 17 Jury Instructions, And Joint Proposed Verdict
- 18 Forms And Separate Verdict Forms
- 19 k. April 7, 2011: Final Pretrial Conference
- 20 l. April 11, 2011 Trial

21 2. The parties have engaged in settlement efforts over an extended period of time,
22 have attended multiple mediation sessions and a settlement conference (see Docket Nos. 10,
23 16, 18, and 20) and, with the continuing assistance of mediator Howard Herman, presently are
24 engaged in discussions and negotiations in an effort to reach agreement on the remaining
25 unresolved issues in the case with the objective of reaching a global settlement of the case.

26 Stipulation And [Proposed] Order For
Case Management Conference

1 The parties estimate that it will take between one to two months before they will be able to
 2 complete the settlement process and know whether they will settle the case or proceed with the
 3 pretrial and trial process.

4 3. The pending deadlines in the case present a significant impediment to the
 5 parties reaching agreement on a global settlement: On the one hand, without an extension of
 6 time to conduct and complete discovery, the parties will be forced to conduct expensive
 7 discovery concurrently with attempting to settle the case, which will significantly reduce the
 8 prospects for a global settlement. On the other hand, given the present deadlines in the case, if
 9 the parties do not engage in discovery concurrently with attempting to settle the case, they will
 10 not have sufficient time to conduct the discovery that the case warrants.

11 4. Because it is in the best interest of the parties and the court process to complete
 12 the settlement phase of the case prior to incurring the substantial expense of discovery while at
 13 the same time providing each side sufficient time to conduct necessary discovery or meet
 14 subsequent deadlines if the parties are not able to reach a global settlement, which will
 15 maximize the prospects for a settlement, the parties submit that good cause exists to extend the
 16 discovery deadlines and related follow on deadlines and dates.

17 NOW THEREFORE, it is hereby stipulated by and between plaintiff Hollynn Delil, by
 18 and through her attorney Sidney J. Cohen, Esq. and defendant Golden Gate bridge, Highway,
 19 and Transit District, by and through its attorney Kurt Franklin, that the presently scheduled
 20 pretrial and trial dates as set forth in paragraph 1a through i. be continued to the following
 21 dates:

- 22 a. November 3, 2010: Expert Witness Disclosure.
- 23 b. November 15, 2010: Rebuttal Expert Witness Disclosure.
- 24 c. December 15, 2010: Completion Of All Discovery
- 25 d. January 14, 2011: Last Day To File, Serve, And Notice

26 Stipulation And [Proposed] Order For
 Case Management Conference

- 1 Dispositive Motions
- 2 e. February 17, 2011: Last Date to Hear Dispositive Motions.
- 3 f. April 7, 2011: Last Day to Meet and Confer for Pretrial
- 4 Statement Preparation and Content, Etc.
- 5 g. April 21, 2011: Last Day to File Joint Pretrial Statement And
- 6 Documents Described In FRCP 26(a)(3), Etc.,
- 7 And Last Day To File In Limine Motions
- 8 h. April 28, 2011: Last Day To File Opposition To In Limine
- 9 i. May 5, 2011: Pretrial Conference
- 10 j. May 6, 2011: Last Day To File Trial Briefs, Joint Set Of
- 11 Required Voir Dire, Voir Dire Questions Not
- 12 Agreed Upon, Joint Set Of Additional Proposed
- 13 Jury Instructions, And Joint Proposed Verdict
- 14 Forms And Separate Verdict Forms
- 15 k. May 18, 2011 : Final Pretrial Conference

16 ///

17 ///

18 ///

19

20

21

22

23

24

25

26 Stipulation And [Proposed] Order For
Case Management Conference

1 I. May 23, 2011 Trial

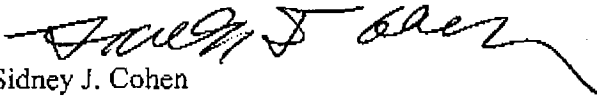
2 It is further stipulated that this Stipulation may be signed in counterparts and
3 that facsimile or electronically transmitted signatures of the Stipulation shall be as valid and
4 binding as original signatures.

5 Date: 7/27/10

SIDNEY J. COHEN
PROFESSIONAL CORPORATION

6

7

By 
Sidney J. Cohen
Attorney for Plaintiff

8

9 Date: 7/27/10

HANSON BRIDGETT LLP

10

11

By 
~~Kurt A. Franklin~~ Adam W. Hoffmann
Attorney for Defendant

12

13

ORDER

14

15

16

GOOD CAUSE APPEARING THEREFORE, it is ordered that the pretrial and trial
dates in this action are continued to the following dates:

17

a. November 3, 2010: Expert Witness Disclosure.

18

b. November 15, 2010: Rebuttal Expert Witness Disclosure.

19

c. December 15, 2010: Completion Of All Discovery

20

d. January 14, 2011: Last Day To File, Serve, And Notice

21

Dispositive Motions

22

e. February 17, 2011: Last Date to Hear Dispositive Motions.

23

f. April 7, 2011: Last Day to Meet and Confer for Pretrial Statement
Preparation and Content, Etc.

24

25

g. April 21, 2011: Last Day to File Joint Pretrial Statement And

26

Stipulation And [Proposed] Order For
Case Management Conference

1 Documents Described In FRCP 26(a)(3), Etc.,
2 And Last Day To File In Limine Motions
3 h. April 28, 2011: Last Day To File Opposition To In Limine
4 i. May 5, 2011: Pretrial Conference
5 j. May 6, 2011: Last Day To File Trial Briefs, Joint Set Of
6 Required Voir Dire, Voir Dire Questions Not
7 Agreed Upon, Joint Set Of Additional Proposed
8 Jury Instructions, And Joint Proposed Verdict Forms
9 And Separate Verdict Forms
10 June 2, 2011
11 k. ~~May 18, 2011~~ : Final Pretrial Conference
12 l. ~~May 23, 2011~~
June 5, 2011 Trial

13 **IT IS SO ORDERED.**

14 Date: July 28, 2010

15 
16 Maria Elena James
17 United States Magistrate Judge
18
19
20
21
22
23
24
25
26

Stipulation And [Proposed] Order For
Case Management Conference

6

2483663.1